General Comment
It is an accepted supposition that RCRA was created for industrial entities, where large quantities of a few chemicals are generated. In contrast, research institutions generate small quantities of innumerable hazardous chemicals. Compliance with RCRA breaks down at research institutions because of the requirements to follow the minutia details for the hundreds of waste streams found in thousands of small containers spread over millions of square feet of laboratory space.

Comment #1
While I agree, in general, with all of the points of the "Best Management Practices" (BMP) as developed by the Howard Hughes Medical Institute it is point 4 (Standard Operating Practices; Provisions of the institution's written Chemical Hygiene Plan apply to all practices involving the handling, containing, and storing of chemicals in laboratories) that I feel would provide the greatest regulatory relief for research institutions. While the adoption of this BMP would provide regulatory relief it would not increase potential for threats to human health and the environment.

Because the typical waste generated at a research facility (in a laboratory, inside a building, on a campus) is small in respect to the volume of the area in which it is generated. There is little, if any, chance that a hazardous chemical will be released from a research institution in sufficient quantity so as to present a threat to the environment. Hence, the only real plausible threat from hazardous chemicals in a research setting is to the human population, specifically the laboratory personnel. The Occupational Safety and Health Administration promulgated the Laboratory Standard requiring Chemical Hygiene Plans (CHP). A CHP sets safe and prudent handling techniques for all research chemicals, including waste, for the sole purpose of protecting the workers from unnecessary exposure. To impose RCRA regulations over a CHP is not only redundant, but requires researchers to follow two sets of rules with no additional benefit. This redundancy introduces a complexity that, if an adequate CHP is in place and followed, will simply result in "failures to comply" with the regulations, where the "failure to comply" poses no threat to human health or the environment. As such, it is my firm belief that, if a CHP is in effect for a research area, RCRA regulations should not apply. Once waste is removed from the research area for any purpose[1] RCRA regulation would immediately apply. By not applying RCRA regulations until the waste leaves the research area most of the other BMPs outlined by the Howard Hughes Medical Institute would quickly and easily fall into place.

Comment #2
Due to the propensity of the EPA to use self-audit information against an institution it is self-defeating. Point 14 of HHMI; Program Evaluation and Improvement, would be a very good aide if EPA or any state agency in an enforcement action could not use the information against an institution. Other ways it is a self-defeating proposition.

[1] Storage in a satellite accumulation area or a 90 day accumulation point
Treatment or disposal